



The Future of NPL

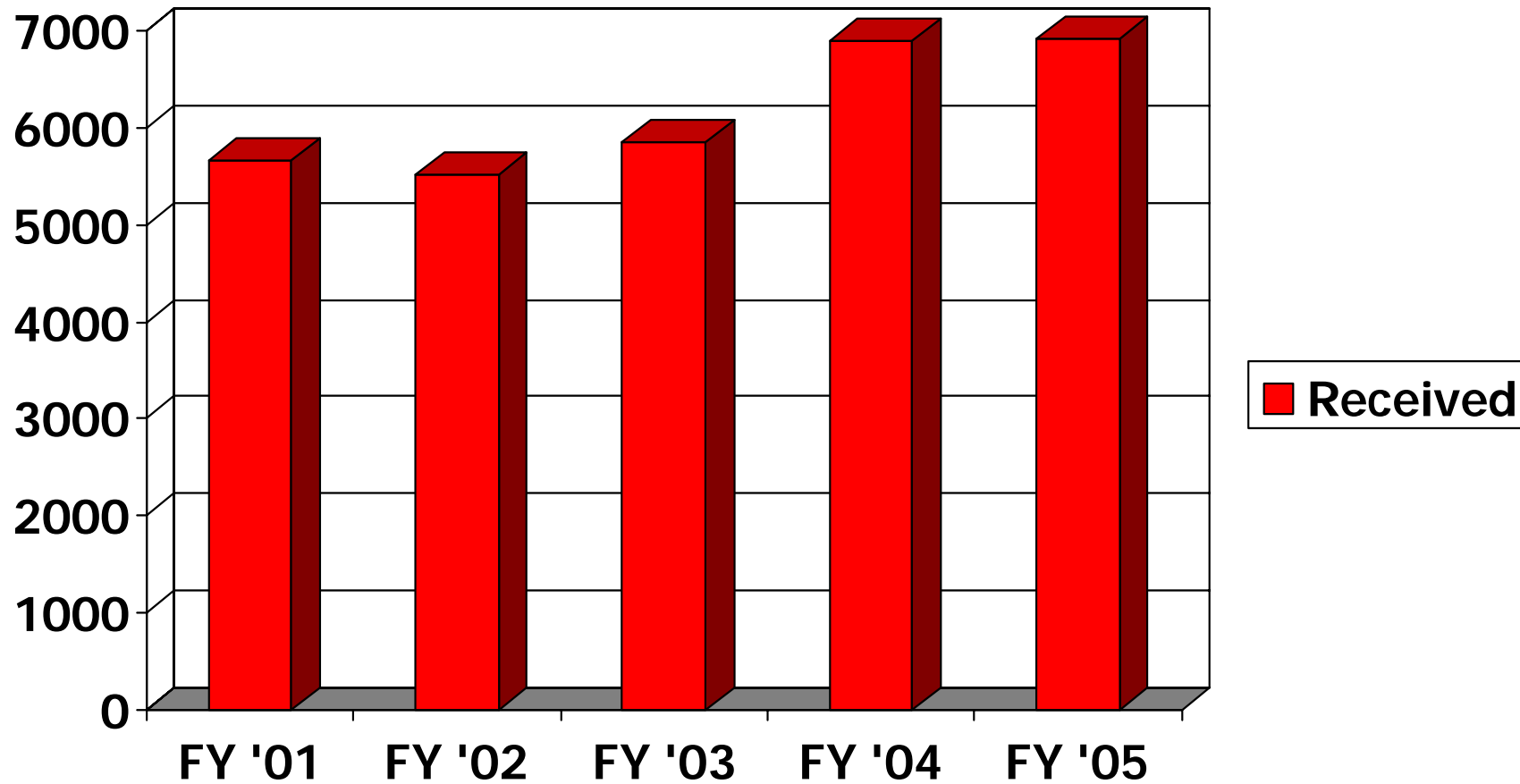
Dawit Bezabeh, Ph.D.

Senior Chemist

240-264-1449

Dawit.Bezabeh@ttb.gov

Volume of NBA Formula Submissions



Formula submitted and processed During 01/05-10/05

Submission #	F01	F02	F03	F04	F05
Approved	45 %	52%	51%	52%	55%
Disapproved	3.4%	6.5%	5.4%	6.8%	0.0%
No Action	18%	12%	10%	14%	0.0%
Returns	20%	18%	17%	16%	27%
Total	4123	1054	223	44	11



Current Issues

- Incomplete formula submissions
- Workload has increased over the past few years
- Turn around time: 10 business days
- Increasing requests for “Rush” approvals



Challenges w/ Current Process

- **Beverage industry's demand for TTB approved formulas**
- **Flavored Beverages “Product Concept to Market” condensed time**
- **Products Submitted vs. Products Manufactured**
- **NPL Process has not been updated in many years**
- **NPL has the highest turnover of employees**
- **Increasing difficulty to meet the established 10 day turnaround time**

Our Objectives

- Minimize NPL's burden on industries' business opportunities
- Expedite formula approval
- Reduce handling of formulas





Business Process Re-engineering

- Contractor hired to do a thorough review of the current process
- Contractor evaluated other Federal agencies with similar missions
- Proposed recommendations for both nonbeverage and specially denatured alcohol (SDA) processes



Proposed Formula Process

- Self-certified formula will be submitted to NPL at the time of manufacture
- Product not meeting self-certification guidelines:
 - Product will undergo internal tasting
 - Sample and formula with tasting results will be submitted to NPL
 - NPL will concur or not concur with the result
- Drawback claims will be submitted to the NRC



The Road to Self-Certification

- Draft of proposed regulations
- Notice of proposed rulemaking will be published in Federal Register
- Comment period
- Revision
- Final rule



NPL's Role After Self-Certification

- Enhanced NPL website, including tutorial
- Seminars
- Provide expanded guidelines
- Provide advice and training to TTB auditors and investigators
- Develop analytical methods that would help expand the guidelines



Interim Solution

- Use the tutorial
- Provide complete information on the formula
 - TTB# or spec. for inter. flavors
 - Identify, quantify all sources of ethanol
- Identify and quantify limiting ingredients
- **Disclose what makes a product unfit!!!**